RCRA Inspection Report

1) Inspectors and Authors of the Report

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2) Facility Information

Veolia ES Technical Solutions, LLC
2176 Will Suitt Road
Creedmoor, North Carolina 27522
EPA ID No.: NCD 986 171 189

3) Responsible Official

Mr. J. Leonard Beck
Facility Operations Manager
Mid-Atlantic Branch, Technical Solutions, North America
(919) 529-3223

4) Inspection Participants

J. Leonard Beck	Veolia ES Technical Solutions, LLC
Anthony Hudson	Veolia ES Technical Solutions, LLC
Ray Fletcher	Veolia ES Technical Solutions, LLC
Allen Jenkins	Veolia ES Technical Solutions, LLC
John Dyer	Veolia ES Technical Solutions, LLC
Lori Foote	Veolia ES Technical Solutions, LLC
James Gilreath	NC DENR – HW Section - DWM
Jarwin (JD) Hester, R.S.	NC DENR – HW Section - DWM
Alan Newman	US EPA Region 4

5) Date and Time of Inspection

September 17, 2014, at 9:00 a.m.

6) **Applicable Regulations**

40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, & 278 Resource Conservation and Recovery Act (RCRA) Sections 3002 - 3005, (42 US Code - Annotated U.S.C.A. 6922 - 6925), and Title 15A Chapter 13, North Carolina Administrative Code and North Carolina Permit No. NCD 986 166 338 R2.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) to determine the Veolia ES Technical Solutions, LLC's compliance with the applicable regulations.

8) **Facility Description**

Veolia ES Technical Solutions, LLC (Veolia) operates as a treatment, storage, and disposal facility of hazardous waste permitted under the RCRA and operates according to permit number NCD 986 166 338 R2 issued on July 24, 2012. The permit allows Veolia to store and treat hazardous waste. However, Veolia currently only stores hazardous waste.

Hazardous waste is managed in containers on a 24 by 130 foot loading dock with a secondary containment system on each side of on the dock. The dock and secondary containment system are covered by a roof. The secondary containment system consists of a 50 by 130 foot concrete pad and trench system on each side of the loading dock. The trench on each side of the dock is divided into two separate sections by a six inch valve that normally remains in the closed position. A four inch wide separation curb divides the base on each side of the dock into two separate sections providing four separate secondary containment sections that allow for separation of incompatible waste. The containment capacity of the secondary containment system on each side of the dock is 4,906 gallons.

An additional containment trench is located in the southeast quadrant. The capacity of this trench is 4,570 gallons. A cargo tank holding up to 7,000 gallons of liquid waste may be stored in the southeast quadrant. The loading dock has space for 20 waste containing units (bays) such as trailer for storage of small and mid-sized container, roll-off boxes, and cargo tanks.

The maximum amount of hazardous waste that may be on site is 88,000 gallons or 1,600 55-gallon containers. Generally, all RCRA listed and characteristic waste is accepted as identified. Wastes fall into two broad categories, packaged laboratory chemicals (Lab packs) and containerized liquids and solids. Container sizes range from 5-gallon pails and small fiberboard containers to 55-gallon drums and intermediate bulk container to roll-off and cargo tanks. Veolia is permitted to comingle compatible solid and liquid hazardous waste. The maximum treatment capacity is 10,000 gallons per day.

The Permit requires that the permittee comply with the requirements of a containment system found in 40 C.F.R. § 264.175(b)(1)-(5) as adopted in 15A NCAC 13A .0109, including having a base which is free of cracks and gaps and is able to contain leaks, spills and accumulated rainfall until such time that the material is detected and removed. The containment system must be designed for efficient drainage and have sufficient capacity to contain 10% of the total volume of

container. The permittee shall maintain the containment system in accordance with Section I and P of the Attachment. Veolia is open for operations 8:00 a.m. to 5:00 p.m. Monday through Friday. Veolia employs 14 workers and operates on six acres of a 25 acre parcel.

9) **Previous Inspection History**

This facility is routinely inspected seven to eight times per month under the resident inspector program in North Carolina. The most recent violation noted was in 2003.

10) **Findings**

After presenting their credentials to J. Leonard Beck and Anthony Hudson and explaining the purpose of the inspection, the inspectors requested an explanation of the operations and a tour of the facility. The inspectors performed a walk-through inspection of the facility. Below is a description of the observations made during the walk-through.

- Warehouse

Veolia was operating a satellite accumulation area (SAA) in the warehouse near the entrance to the loading dock that consisted of one 55-gallon metal container. This SAA was used to accumulate site generated hazardous waste solids. This container was closed, in good condition, and dated with an accumulation start date of September 5, 2014. SAA containers are not required to be dated. Once the SAA exceeds 55 gallons of waste any excess waste is required to be dated and removed from the SAA within three days.

Pursuant to 15A NCAC 13A.0107(c) (40 C.F.R. § 262.34(c)(2)), a generator who accumulates either hazardous waste or acutely hazardous waste listed in § 261.31 or § 261.33(e) in excess of the amounts listed in paragraph (c)(1) of this section at or near any point of generation must, with respect to that amount of excess waste, comply within three days with paragraph (a) of this section or other applicable provisions of this chapter. During the three day period the generator must continue to comply with paragraphs (c)(1)(i) and (ii) of this section. The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

- Loading Dock

Facility representatives stated that this facility began operations as a 10-day hazardous waste transfer station in 1988. In 1990, the facility filed a RCRA Part B permit application for storage and treatment of hazardous waste. On the day of the inspection, each of the 20 available slots at the loading dock were occupied by trailers (photos 1-3). Facility representatives stated that bays 12, 14, 16, and 18 were used for inbound and outbound trailers. The remainder of the bays were occupied by trailers used to segregate and store containers of hazardous waste (photo 4). There were two heat sensors over each trailer with a direct alarm to the fire department. There were two halotron fire extinguishers set at 165 degrees F. Hazardous waste containers received by Veolia can go either straight to trailer for shipment off-site or be stored for fewer than 365 days in on

the of the storage trailers. The secondary containment trenches are equipped with gas monitors as a precaution.

The inspection team toured each of the bays and noted dirt in one of the storage trailers. Facility representatives state that there were no procedures in place to conduct routine cleanup of these storage containers to remove dirt that may accumulated on the floor of the trailers. If a spill occurs in a trailer where dirt or trash has accumulated, the resulting mixture of dirt and trash and hazardous waste may be regulated as hazardous waste. The EPA recommends a procedure be implemented to regularly inspect and clean out trailers to ensure no containers are leaking. The inspection team also noted one cubic yard tote that was labeled on two opposite sides. There was one similar tote on one side which covered one of the container labels. If another container was placed on the other side, no container label would be visible from the aisle. The inspection team suggested labels be visible from the aisle.

During the inspection, the inspection team noted numerous containers on the surface of the dock between the storage trailers. This area is not included in the permitted storage area for the facility. Veolia clears this area every night and does not store hazardous waste on the dock. Veolia may want to consider maintaining a coating on the dock to match the secondary containment requirements. If a container comes off a trailer and begins to leak, it would be advised to have this surface also be impervious.

- Secondary Containment Pad

The inspection team noted trash and debris underneath many of the trailers in the storage and loading bays. Facility personnel identified this material as blown in debris and dirt (photos 5-6). Facility representatives stated that they do not open containers of hazardous waste at their facility. They did not believe the material under the trailers was anything but dirt and trash blown in from the sides of the loading dock.

The secondary containment pad appears to be weathered but intact. When asked about pad maintenance, facility representatives stated they had never conducted any maintenance on the pad since at least 1988. Records showed that the pad surface underneath the trailer bays and the trenches were coated with a coating prior to 1988. A records search has not produced the type of coating used for the concrete. The pad slopes at a 1% grade to the trenches. Since there has been little to no maintenance of the coating on the pad, there is no current presence of cracks or gaps, Veolia will need to demonstrate that the current coating is impervious to meet the § 264.175(b) requirement in the permit. NCDENR and Veolia will work out how best to demonstrate that

- Permit Modification

New trailers in the shipping industry will be longer than the bays at Veolia can currently accommodate. The new trailers are going to be 53 foot long trailers. Veolia applied for a Class 2 permit modification to redesign the secondary containment system to accommodate the new larger trailers. This permit modification was granted on November 6, 2013, by NCDENR. Veolia will need to extend the roof overhang to accommodate larger trailers in the bays.

- Security and Documentation Access

The facility uses infra-red cameras to monitor the site outside of operational hours. Veolia hired a monitoring company to review footage and respond to alarms. There are approximately five Veolia employees that have ability to remotely log into system and see real time footage from the site cameras.

In the case of an emergency, accurate records would be needed to appropriately respond to the emergency. The facility utilizes a system called Eplan which is managed by the University of Dallas to store and access records remotely. Most of the TSDs in North Carolina are using this system for remote access to inventory records.

- Record Review

The inspection team reviewed the facility records including the manifests and bills of lading, training records, waste analysis plan, contingency plan, closure plan, cost estimate, the permit, 2014 annual groundwater monitoring report, and inspection records, among other records. There were no apparent violations noted in the record review.

11) **Signed**

Alan R. Newman, Inspector — 3/3/2015 Date

12) **Concurrence**

Larry Lamberth
Chief, Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch — 3/3/15 Date

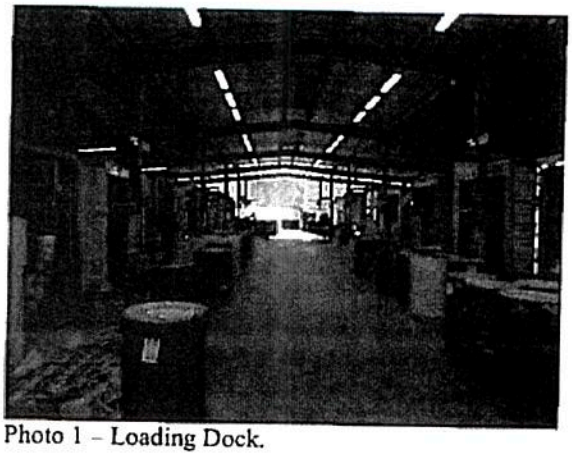

Photo 1 – Loading Dock.

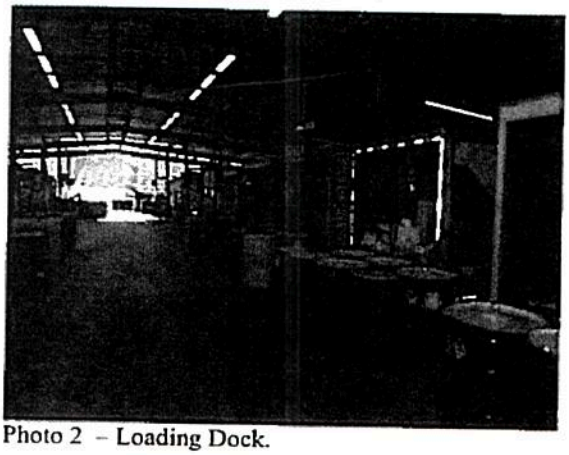

Photo 2 – Loading Dock.

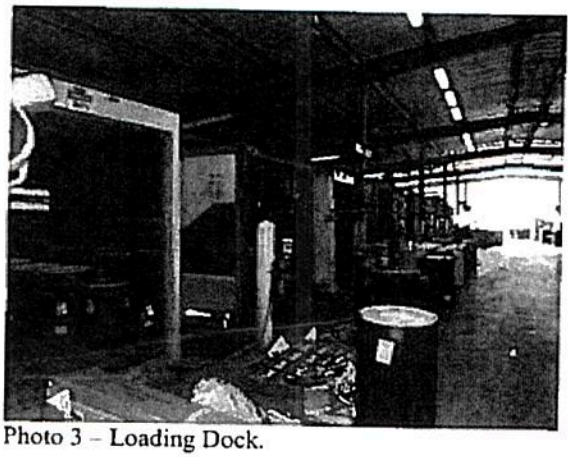

Photo 3 – Loading Dock.

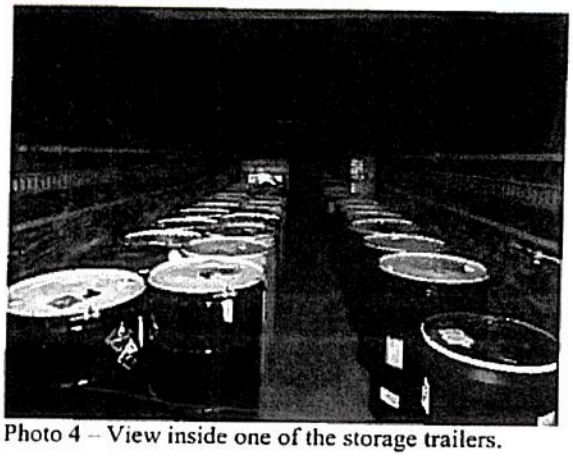

Photo 4 – View inside one of the storage trailers.

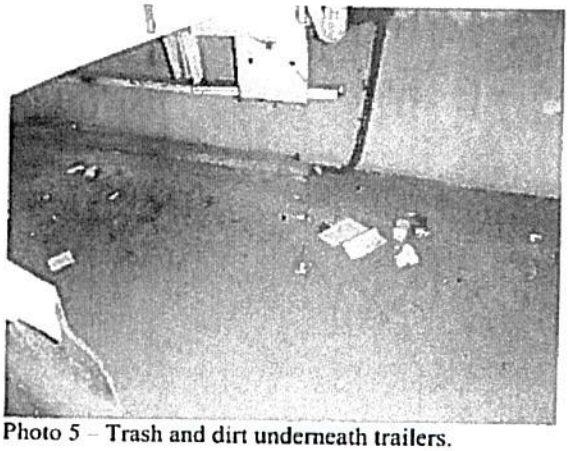

Photo 5 – Trash and dirt underneath trailers.

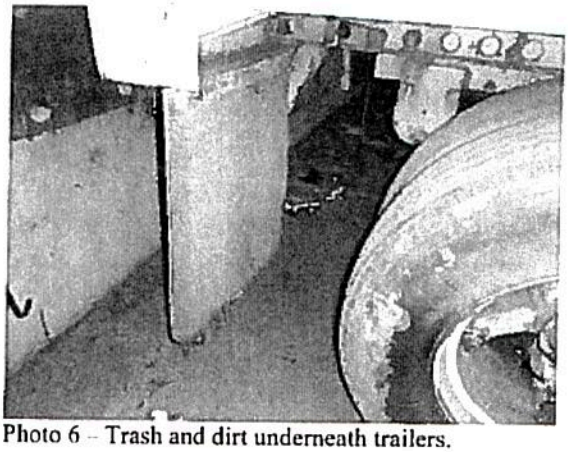

Photo 6 – Trash and dirt underneath trailers.